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UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT  
12  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
14 WESTERN DIVISION

15 IN THE MATTER OF SEIZURE OF  
16 APPLICATION, AFFIDAVIT, AND  
SEIZURE WARRANT 2:19-MJ-144

No. 2:19-MJ-144

**GOVERNMENT'S EX PARTE APPLICATION  
FOR ORDER UNSEALING SEIZURE  
WARRANT AFFIDAVIT, APPLICATION AND  
SEALING ORDER; DECLARATION OF RYAN  
J. WATERS**

20 Plaintiff United States of America, by and through Special  
21 Assistant United States Attorney Ryan J. Waters, hereby applies ex  
22 *parte* to the Court for an order unsealing the supporting affidavit,  
23 application, and sealing order for the seizure warrant issued in the  
24 above-captioned case.

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1 The reasons supporting the *ex parte* application are set forth in  
2 the accompanying Declaration of Ryan J. Waters.

3 Dated: June 17, 2019

Respectfully submitted,

4 NICOLA T. HANNA  
United States Attorney

5 BRANDON D. FOX  
6 Assistant United States Attorney  
7 Chief, Criminal Division

8 /s/ Ryan J. Waters  
9 RYAN J. WATERS  
Special Assistant United States Attorney

10 Attorneys for Plaintiff  
11 UNITED STATES OF AMERICA  
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**DECLARATION OF RYAN J. WATERS**

I, Ryan J. Waters, hereby declare:

1. I am a Special Assistant United States Attorney in the Central District of California. I make this declaration in support of the government's *ex parte* application for an order unsealing all supporting affidavits, applications, and sealing orders relating to the following seizure warrants:

a. *In the Matter of the Seizure of all funds up to \$12,945,969.77 on deposit in PayPal Inc., account number 1363478068926337206; all funds up to \$353,400.15 on deposit in PayPal Inc., account number 1171254696292774961; and all funds up to \$52,615.00 on deposit in PayPal Inc., account number 1624332698454781813.*

Case Number 2:19-MJ-144 filed on January 18, 2019.

b. *In the Matter of the Seizure of all funds up to \$2,414,417.20 on deposit in JP Morgan Chase Bank, account number 855196783 and all funds up to \$600,000.00 on deposit in JP Morgan Chase Bank, account number 3655817980.*

Case Number 2:19-MJ-145 filed on January 18, 2019.

c. *In the Matter of the Seizure of all funds up to \$4,904,532.78 on deposit in Wells Fargo Bank, account number 1485027435 and all funds up to \$250,000.00 on deposit in Wells Fargo Bank, account number 7302029967.*

Case Number 2:19-MJ-146 filed on January 18, 2019.

1           2. On January 18, 2019, the Honorable Judge Frederick F. Mumm,  
2 United States Magistrate Judge, signed the referenced warrants and  
3 orders sealing the affidavits and applications until further order of  
4 the Court.

5           3. On June 6, 2019, a federal grand jury returned an  
6 indictment arising from the investigation described in the  
7 affidavits, in the matter of *United States v. Argishti Khudaverdyan*  
8 *and Alen Gharehbagloo*, CR No. 19-339-SVW. That indictment was filed  
9 under seal and ordered to remain under seal until the arrest of any  
10 defendants in that case.

11           4. On June 10, 2019, pursuant to arrest warrants issued under  
12 CR No. 19-339-SVW, federal agents arrested the two individuals  
13 charged in that case. Those two individuals made their initial  
14 appearances on June 10, 2019.

15           5. In order to comply with its discovery obligations in *United*  
16 *States v. Argishti Khudaverdyan and Alen Gharehbagloo*, CR No. 19-339-  
17 SVW, the government wishes to produce the seizure warrants,  
18 supporting affidavits, applications and sealing orders to the  
19 defendants. However, under the terms of the Sealing Orders, the  
20 supporting affidavits remain under seal.

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1 The government therefore requests that this Court unseal the  
2 supporting affidavits, applications and sealing orders.

3 I declare under penalty of perjury that the foregoing is true  
4 and correct.

5 Executed on June 17, 2019, at Los Angeles, California.

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7 /s/ Ryan J. Waters  
8 RYAN J. WATERS  
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